Commonwealth of Massachusetts
Executive Office of Energy & Environmental Affairs

Department of Environmental Protection

Southeast Regional Office • 20 Riverside Drive, Lakeville MA 02347 • 508-946-2700

DEVAL L. PATRICK
Governor

MAEVE VALLELY BARTLETT
Secretary

DAVID W. CASH
Commissioner

Date: December 10, 2014

Mr. Mark Fyrer
SwimEx, Inc.
846 Airport Road
Fall River, MA 02720

RE: Fall River
Transmittal No.: X262733
Application No.: SE-14-028
Class: *Submin*
FMF No.:561684
AIR QUALITY PLAN APPROVAL

Dear Mr. Fyrer:

The Massachusetts Department of Environmental Protection ("MassDEP"), Bureau of Waste Prevention, has reviewed your Limited Plan Application ("Application") listed above. This Application concerns the proposed relocation of your existing fiberglass manufacturing facility located at 846 Airport Road, Fall River to 390 Airport Road, Fall River. SwimEx, Inc. (here in referred to as "facility") is proposing no changes to process operations.

This Application was submitted in accordance with 310 CMR 7.02 Plan Approval and Emission Limitations as contained in 310 CMR 7.00 "Air Pollution Control," regulations adopted by MassDEP pursuant to the authority granted by Massachusetts General Laws, Chapter 111, Section 142 A-J, Chapter 21C, Section 4 and 6, and Chapter 21E, Section 6. MassDEP's review of your Application has been limited to air pollution control regulation compliance and does not relieve you of the obligation to comply with any other regulatory requirements.

MassDEP has determined that the Application is administratively and technically complete and that the Application is in conformance with the Air Pollution Control regulations and current air pollution control engineering practice, and hereby grants this **Plan Approval** for said Application, as submitted, subject to the conditions listed below.

Please review the entire Plan Approval, as it stipulates the conditions with which the Facility owner/operator ("Permittee") must comply in order for the Facility to be operated in compliance with this Plan Approval.

1. DESCRIPTION OF FACILITY AND APPLICATION

SwimEx, Inc. (SwimEx) is a manufacturer of fiberglass composite products, which include aquatic therapy, sports and conditioning pools. Production process includes the application of gelcoat resin to the molds prior to the application of the polyester resin.

SwimEx's current facility operates under Plan Approval 4P05008 issued by MassDEP on April 27, 2005. This application proposes the relocation of its existing fiberglass product manufacturing operation from 846 Airport Road to 390 Airport Road in Fall River, Massachusetts. With this application, SwimEx requests the flexibility to change the raw materials used and products manufactured, provided that the enforceable emission limitations are not exceeded. There are no proposed changes to process operations. SwimEx shall notify MassDEP when operations cease at the 846 Airport Road facility. Upon notification from SwimEx, the MassDEP will accept the surrender of Plan Approval No. 4P05008 making it null and void.

Emissions from the fiberglass product manufacturing operations are primarily Volatile Organic Compounds (VOC), Hazardous Air Pollutants (HAP) and Acetone, a Non-Criteria Pollutant. SwimEx proposes to limit facility wide total VOC emissions to 6.8 tons/year, total HAP emissions to 5.8 tons/year, and single HAP emissions to 5.0 tons/year. Best Available Control Technology (BACT) will be achieved by the use of best management practices, the SCRIMP closed molding process and a carbon filter, with a minimum 90% control efficiency. The facility is an area source of HAP and is not currently subject to the requirements of 40 CFR Part 63, Subpart WWWW. HAP are listed in the 1990 Clean Air Act (CAA) Amendments, Section 112(b). The facility will conform to the applicable VOC content limits, application requirements, and work practice standards of 310 CMR 7.18(30) for adhesives and sealants. Best Available Control Technology (BACT) is defined in Table 2 of this Approval.

Particulate Matter (PM) emissions from the Trimming/Drilling/Sanding operation is less than 0.1 tons per year and is exempt from plan approval as a de-minimis increase in emissions in accordance with 310 CMR 7.02(2)(b)(7). Facility equipment not subject to the plan approval includes a natural gas fired 4.75 MMBtu/hr capacity heater for the spray booths as well as several small natural gas fired space heaters each with a heat input capacity of less than 0.5MMBtu/hr. Each of these units has a heat input capacity of less than 10 MMBtu/hr and are therefore exempt in accordance with 310 CMR 7.02(2)(b)15.

2. EMISSION UNIT (EU) IDENTIFICATION

Each Emission Unit (EU) identified in Table 1 is subject to and regulated by this Plan Approval:

Table 1

EU#	Description	Design Capacity	Pollution Control Device (PCD)
1	Gel coat Application	n/a	HVLP spray guns/ Spray Booth Filters
2	Closed Molding	n/a	Carbon Filter
3	Open molding and catalysts	n/a	None
4	Cleaning	n/a	None
5	Adhesives/Sealants	n/a	None

Table 1 Key:
EU# = Emission Unit Number
HVLP = High Volume Low Pressure
n/a = Not Applicable
PCD = Pollution Control Device

3. APPLICABLE REQUIREMENTS

A. OPERATIONAL, PRODUCTION and EMISSION LIMITS

The Permittee is subject to, and shall not exceed the Operational, Production, and Emission Limits as contained in Table 2 below:

Table 2

EU#	Operational/ Production Limit	Air Contaminant	Emission Limit
1	1. All spray applications shall employ high transfer efficiency equipment such as a High Volume Low Pressure (HVLP) spray gun.	All	N/A
	2. VOC usage, as contained in the gelcoat shall not exceed 0.6 tons per month.	VOC	0.6 TPM note1
	3. VOC usage, as contained in the gelcoat shall not exceed 3.2 tons per consecutive 12-month period.		3.2 TPY note1
	4. Single HAP usage, as contained in the gel coat shall not exceed 0.5 tons per month.	HAP (single)	0.5 TPM note1
	5. Single HAP usage, as contained in the gelcoat shall not exceed 2.4 tons per consecutive 12-month period.		2.4 TPY note1

Table 2			
EU#	**Operational/ Production Limit**	**Air Contaminant**	**Emission Limit**
1	6. Total HAP usage, as contained in the gelcoat shall not exceed 0.6 tons per month.	HAP (Total)	0.6 TPM note1
	7. Total HAP usage, as contained in the gelcoat shall not exceed 3.2 tons per consecutive 12- month period.		3.2 TPY note1
	8. Total Organic HAP emissions from gelcoat application operations shall not exceed the limit detailed in 40 CFR 63 Subpart WWWW Table 3.note3		White/off white pigmented gelcoat application: ≤ 267 lb/ton
			Fire retardant gelcoat application: ≤ 854 lb/ton
			Clear gelcoat application: ≤ 522 lb/ton
			All other pigmented application: ≤ 377 lb/ton
2	9. Styrene, as contained in resin used in the closed molding process, shall not exceed 33 percent, by weight.	VOC HAP (Single) HAP (Total)	N/A
	10. The Permittee shall operate the carbon filter unit in accordance with manufacturer's specifications to ensure the system maintains the following control efficiencies. Capture efficiency = 100% Control efficiency ≥ 90% by weight Overall efficiency ≥ 90% by weight		
	11. The Permittee shall limit resin usage in the SCRIMP process to 16,667 Pounds per month.		0.01 TPM note2
	12. The Permittee shall limit resin usage in the SCRIMP process to 100,000 Pounds per consecutive 12-month period.		0.02 TPY note2
3	13. VOC usage, as contained in the resin shall not exceed 0.5 tons per month.	VOC	0.5TPM note1
	14. VOC usage, as contained in the resin shall not exceed 2.9 tons per consecutive 12-month period.		2.9 TPY note1
	15. Single HAP usage, as contained in the resin shall not exceed 0.5 tons per month.	HAP (single)	0.5TPM note1
	16. Single HAP usage, as contained in the resin shall not exceed 2.5 tons per consecutive 12- month period.		2.5 TPY note1

Table 2			
EU#	**Operational/ Production Limit**	**Air Contaminant**	**Emission Limit**
3	17. Total HAP usage, as contained in the resin shall not exceed 0.5 tons per month.	HAP (Total)	0.5TPM note1
	18. Total HAP usage, as contained in the resin shall not exceed 2.5 tons per consecutive 12- month period		2.5 TPY note1
	19. Total Organic HAP emissions from resin applications in the open molding process shall not exceed the limit detailed in 40 CFR 63 Subpart WWWW Table 3. note3		Manual application (shrinkage controlled) ≤ 180 lb/ton
			Mechanical application (shrinkage controlled) ≤ 354 lb/ton
			Open molding putty-Non CR/HS manual Application ≤ 87 lb/ton
4	20. Acetone usage shall not exceed 0. 8 tons per month.	Acetone	0.8 TPM
	21. Acetone usage shall not exceed 4.9 tons per consecutive 12-month period.		4.9 TPY
5	22. VOC content, as contained in any adhesives/ sealants shall not exceed the limits contained in table 1, table 2 of 310 CMR 7.18 (30).	VOC	Adhesives ≤ 200 g/l, as applied
			Sealants ≤ 420 g/l, as applied
	23. VOC usage, as contained in the Adhesive/Sealant, shall not exceed 0.1 tons per month.		0.1 TPM
	24. VOC usage, as contained in the Adhesive/Sealant, shall not exceed 0.4 tons per consecutive 12- month period.		0.4 TPY
	25. The Permittee shall comply with adhesive/Sealant application requirements and work practices in accordance with CMR 7.18(30).		
	26. Single HAP, Total HAP usage, as contained in adhesives/Sealants shall not exceed 0.02 tons per month	HAP (single) HAP (Total)	0.02 TPM
	27. Single HAP, Total HAP usage, as contained in adhesives/Sealants shall not exceed 0.1 tons per consecutive 12-month period.		0.1 TPY

Table 2			
EU#	**Operational/ Production Limit**	**Air Contaminant**	**Emission Limit**
Facility -wide	28. Single HAP usage, as contained in process materials shall not exceed 1.0 tons per month.	HAP (single)	1.0 TPM
	29. Single HAP usage, as contained in process materials shall not exceed 5.0 tons per consecutive 12-month period.		5.0 TPY
	30. The Permittee shall limit the single HAP content of process materials in accordance with Appendix A of this Plan Approval		
	31. Total HAP usage, as contained in process materials shall not exceed 1.1 tons per month.	HAP (Total)	1.1 TPM
	32. Total HAP usage, as contained in process materials shall not exceed 5.8 tons per consecutive 12-month period.		5.8 TPY
	33. The Permittee shall limit the Total HAP content of process materials in accordance with Appendix A of this Plan Approval		
	34. Total VOC usage, as contained in process materials shall not exceed 1.2 tons per month.	VOC	1.2 TPM
	35. Total VOC usage, as contained in process materials shall not exceed 6.8 tons per consecutive 12-month period.		6.8 TPY
	36. Resin and gelcoat non-monomer VOC content shall not exceed the 5% by weight limit.		
	37. The Permittee shall limit the Total VOC content of process materials in accordance with Appendix A of this Plan Approval.		
	38. The Permittee shall take any and all measures necessary to ensure that the operation of the equipment used in the manufacturing process shall not result in visible emissions.	Opacity	0% exclusive of uncombined water vapor

Table 2 Key:
CFR= Code of Federal Regulations
CMR= Code of Massachusetts Regulations
CR/ HS = Corrosion Resistant and/or High Strength
EPA= Environmental Protection Agency
EU# = Emission Unit Number
g/l= grams per liter
HAP (single) = Maximum Single Hazardous Air Pollutant
HAP (total) = Total Hazardous Air Pollutants
HVLP= High Volume Low Pressure
lb/ton= pounds per ton
N/A= Not Applicable
SCRIMP™= Seemann Composites Resin Infusion Molding Process
TPM = tons per month

TPY = tons per consecutive12-month period
VOC = Volatile Organic Compound(s)

Table 2 Notes:

1. The Permittee shall calculate monthly and consecutive 12- month period emissions using the methodology detailed in 40 CFR 63 Subpart WWWW "National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production." Table 1. A copy of the document is incorporated into this plan approval in Appendix B.
2. An Emission Factor of 0.04% of the resin usage is used to calculate emissions from the closed molding (SCRIMP) ™ process. The Emission factor is based on results of testing conducted by TPI industries and takes into account the 90% overall control efficiency of the carbon filter as contained in the resin.
3. The Permittee is an area source of HAP and is not subject to 40 CFR 63 Subpart WWWW. The regulation is used as a basis for establishing Best Available Control Technology (BACT) for this application.

B. COMPLIANCE DEMONSTRATION

The Permittee is subject to, and shall comply with, the monitoring, testing, record keeping, and reporting requirements as contained in Tables 3, 4, and 5 below:

Table 3

EU#	Monitoring and Testing Requirements
1	1. The Permittee shall monitor the pounds of VOC and HAP as used in the gelcoating process each month.
2	2. The Permittee shall monitor the pressure drop across the carbon filter weekly.
	3. The Permittee shall monitor the carbon filter weight gain on a quarterly basis.
3	4. The Permittee shall monitor the pounds of VOC and HAP as used in the resin in the open molding process each month.
4	5. The Permittee shall monitor pounds of Acetone as used for cleaning operations each month.
5	6. The Permittee shall monitor pounds of VOC and HAP as used in adhesives and sealants each month.
Facility-wide	7. The Permittee shall monitor all operations to ensure sufficient information is available to comply with 310 CMR 7.12 Source Registration.
	8. If and when MassDEP requires it, the Permittee shall conduct emission testing in accordance with USEPA Reference Test Methods and regulation 310 CMR 7.13.

Table 3 Key:
CMR= Code of Massachusetts Regulation
EU# = Emission Unit Number
HAP= Hazardous Air Pollutant (s)
MassDEP= Massachusetts Department of Environmental Protection
USEPA= United States Environmental Protection Agency
VOC= Volatile Organic Compound(s)

Table 4	
EU#	**Record Keeping Requirements**
1	1. The Permittee shall maintain a monthly record of gelcoats used.
2	2. The Permittee shall maintain a weekly record of pressure drop across the carbon filter.
	3. The Permittee shall maintain a quarterly record of the carbon filter weight.
	4. The Permittee shall maintain a record of the quantity (by weight) of resin used each month in the closed molding process.
1,3	5. The Permittee shall maintain monthly and annual emissions records calculated using the methodology detailed in 40 CFR 63 Subpart WWWW [note1] "National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production." Table 1, as shown in Appendix B.
3	6. The Permittee shall maintain a monthly record of quantity of each resin type used.
4	7. The Permittee shall maintain a monthly record of acetone used.
5	8. The Permittee shall maintain a monthly record of adhesives/sealants used.
1,2,3,5	9. The Permittee shall maintain a record (e.g. Manufacturer's formulation data, Material Safety Data Sheet, etc.) of each process formulation used, to include formulation density, monomer and non-monomer VOC content by weight, individual HAP content by weight, Total HAP content by weight, solids content by weight and other information necessary to demonstrate compliance with Table 2.
Facility-wide	10. The Permittee shall maintain adequate records on-site to demonstrate compliance with all operational, production, and emission limits contained in Table 2 above. Records shall also include the actual emissions of air contaminant(s) emitted for each calendar month and for each consecutive twelve month period (current month plus prior eleven months). These records shall be compiled no later than the 15th day following each month. An electronic version of the MassDEP approved record keeping form, in Microsoft Excel format, can be downloaded at http://www.mass.gov/dep/air/approvals/aqforms.htm#report .
	11. The Permittee shall maintain records of monitoring and testing as required by Table 3.
	12. The Permittee shall maintain a copy of this Plan Approval, underlying Application and the most up-to-date SOMP for the EU(s) and PCD(s) approved herein on-site.
	13. The Permittee shall maintain a record of routine maintenance activities performed on the approved EU(s), PCD(s) and monitoring equipment. The records shall include, at a minimum, the type or a description of the maintenance performed and the date and time the work was completed.
	14. The Permittee shall maintain a record of all malfunctions affecting air contaminant emission rates on the approved EU(s) and PCD(s) and monitoring equipment. At a minimum, the records shall include: date and time the malfunction occurred; description of the malfunction; corrective actions taken; the date and time corrective actions were initiated and completed; and the date and time emission rates and monitoring equipment returned to compliant operation.

Table 4	
EU#	**Record Keeping Requirements**
	15. The Permittee shall maintain records required by this Plan Approval on-site for a minimum of five (5) years.
Facility-wide	16. The Permittee shall make records required by this Plan Approval available to MassDEP and USEPA personnel upon request.

Table 4 Key:
CFR= Code of Federal Regulations
EU# = Emission Unit Number
HAP = Hazardous Air Pollutant(s)
MassDEP= Massachusetts Department of Environmental Protection
PCD = Pollution Control Device
SOMP = Standard Operating and Maintenance Procedure
USEPA = United States Environmental Protection Agency
VOC= Volatile Organic Compound(s)

Table 4 Notes:

1. The Permittee is an area source of HAP and is not subject to 40 CFR 63 Subpart WWWW. The regulation is used as a basis for establishing Best Available Control Technology (BACT) for this application.

Table 5	
EU#	**Reporting Requirements**
Facility-wide	1. The Permittee shall submit to MassDEP all information required by this Plan Approval over the signature of a "Responsible Official" as defined in 310 CMR 7.00 and shall include the Certification statement as provided in 310 CMR 7.01(2)(c).
	2. The Permittee shall notify the Southeast Regional Office of MassDEP, BWP Compliance and Enforcement (C/E) Chief by telephone (508) 946-2878, email, sero.air@state.ma.us or fax (508) 946-2865 or (508) 947-6557, as soon as possible, but no later than three (3) business days after discovery of an exceedance(s) of Table 2 requirements. A written report shall be submitted to C/E Chief at MassDEP within ten (10) business days thereafter and shall include: identification of exceedance(s), duration of exceedance(s), reason for the exceedance(s), corrective actions taken, and action plan to prevent future exceedance(s).
	3. The Permittee shall report every three years to MassDEP, in accordance with 310 CMR 7.12, all information as required by the Source Registration/Emission Statement Form. The Permittee shall note therein any minor changes (under 310 CMR 7.02(2)(e), 7.03, 7.26, etc.), which did not require Plan Approval.
	4. The Permittee shall provide a copy to MassDEP of any record required to be maintained by this Plan Approval within 30-days from MassDEP's request.

Table 5	
EU#	**Reporting Requirements**
	5. The Permittee shall submit to MassDEP for approval a stack emission pretest protocol, at least 30 days prior to emission testing, for emission testing as defined in Table 3 Monitoring and Testing Requirements.
	6. The Permittee shall submit to MassDEP a final stack emission test results report, within 45 days after emission testing, for emission testing as defined in Table 3 Monitoring and Testing Requirements.

Table 5 Key:
BWP= Bureau of Waste Prevention
CMR= Code of Massachusetts Regulation
C/E= Compliance and Enforcement
EU# = Emission Unit Number
MassDEP= Massachusetts Department of Environmental Protection

4. SPECIAL TERMS AND CONDITIONS

The Permittee is subject to, and shall comply with, the following special terms and conditions:

A. The Permittee shall comply with the Special Terms and Conditions as contained in Table 6 below:

Table 6	
EU#	**Special Terms and Conditions**
Facility-wide	1. The Permittee shall ensure the proper storage, handling and disposal of VOC, HAP, and Acetone containing materials to reduce evaporative losses and maintain good operating practices.
	2. The Permittee may reconcile the VOC, HAP and Acetone contained in any hazardous waste shipped during a month when determining monthly emissions. The facility shall maintain hazardous waste disposal records and purchase records for VOC, HAP and acetone containing materials for this purpose. Such records shall verify the VOC, HAP and Acetone quantity present in the waste being shipped if reconciling monthly emissions.

Table 6 Key:
CFR= Code of Federal Regulation
CMR= Code of Massachusetts Regulation
EU# = Emission Unit Number
HAP= Hazardous Air Pollutants
HVLP= High Volume Low Pressure
VOC= Volatile Organic Compounds

B. The Permittee shall install and use an exhaust stack, as required in Table 7, on each of the Emission Units that is consistent with good air pollution control engineering practice and that discharges so as to not cause or contribute to a condition of air pollution. Each exhaust stack shall be configured to discharge the gases vertically and shall not be equipped with any part

or device that restricts the vertical exhaust flow of the emitted gases, including but not limited to rain protection devices known as "shanty caps" and "egg beaters." The Permittee shall install and utilize exhaust stacks with the following parameters, as contained in Table 7 below, for the Emission Units that are regulated by this Plan Approval:

Table 7

EU#	Stack Height Above Ground (feet)	Stack Inside Exit Dimensions (feet)	Stack Gas Exit Velocity Range (feet per second)	Stack Gas Exit Temperature Range (^{0}F)
1(SB1)	30	3.57	40	70
1(SB2)	30	3.57	40	70

Table 7 Key:
EU# = Emission Unit Number
^{0}F = Degree Fahrenheit
SB1= Spray Booth 1
SB2= Spray Booth 2

5. GENERAL CONDITIONS

The Permittee is subject to, and shall comply with, the following general conditions:

A. Pursuant to 310 CMR 7.01, 7.02, 7.09 and 7.10, should any nuisance condition(s), including but not limited to smoke, dust, odor or noise, occur as the result of the operation of the Facility, then the Permittee shall immediately take appropriate steps including shutdown, if necessary, to abate said nuisance condition(s).

B. If asbestos remediation/removal will occur as a result of the approved construction, reconstruction, or alteration of this Facility, the Permittee shall ensure that all removal/remediation of asbestos shall be done in accordance with 310 CMR 7.15 in its entirety and 310 CMR 4.00.

C. If construction or demolition of an industrial, commercial or institutional building will occur as a result of the approved construction, reconstruction, or alteration of this Facility, the Permittee shall ensure that said construction or demolition shall be done in accordance with 310 CMR 7.09(2) and 310 CMR 4.00.

D. Pursuant to 310 CMR 7.01(2)(b) and 7.02(7)(b), the Permittee shall allow MassDEP and / or USEPA personnel access to the Facility, buildings, and all pertinent records for the purpose

of making inspections and surveys, collecting samples, obtaining data, and reviewing records.

E. This Plan Approval does not negate the responsibility of the Permittee to comply with any other applicable Federal, State, or local regulations now or in the future.

F. Should there be any differences between the Application and this Plan Approval, the Plan Approval shall govern.

G. Pursuant to 310 CMR 7.02(3)(k), MassDEP may revoke this Plan Approval if the construction work is not commenced within two years from the date of issuance of this Plan Approval, or if the construction work is suspended for one year or more.

H. This Plan Approval may be suspended, modified, or revoked by MassDEP if MassDEP determines that any condition or part of this Plan Approval is being violated.

I. This Plan Approval may be modified or amended when in the opinion of MassDEP such is necessary or appropriate to clarify the Plan Approval conditions or after consideration of a written request by the Permittee to amend the Plan Approval conditions.

J. The Permittee shall conduct emission testing, if requested by MassDEP, in accordance with USEPA Reference Test Methods and regulation 310 CMR 7.13. If required, a pretest protocol report shall be submitted to MassDEP at least 30 days prior to emission testing and the final test results report shall be submitted within 45 days after emission testing.

K. Pursuant to 310 CMR 7.01(3) and 7.02(3)(f), the Permittee shall comply with all conditions contained in this Plan Approval. Should there be any differences between provisions contained in the General Conditions and provisions contained elsewhere in the Plan Approval, the latter shall govern.

6. MASSACHUSETTS ENVIRONMENTAL POLICY ACT

MassDEP has determined that the filing of an Environmental Notification Form (ENF) with the Secretary of Energy & Environmental Affairs, for air quality control purposes, was not required prior to this action by MassDEP. Notwithstanding this determination, the Massachusetts Environmental Policy Act (MEPA) and 301 CMR 11.00, Section 11.04, provide certain "Fail-Safe Provisions," which allow the Secretary to require the filing of an ENF and/or an Environmental Impact Report (EIR) at a later time.

7. APPEAL PROCESS

This Plan Approval is an action of MassDEP. If you are aggrieved by this action, you may request an adjudicatory hearing. A request for a hearing must be made in writing and postmarked within twenty-one (21) days of the date of issuance of this Plan Approval.

Under 310 CMR 1.01(6)(b), the request must state clearly and concisely the facts, which are the grounds for the request, and the relief sought. Additionally, the request must state why the Plan Approval is not consistent with applicable laws and regulations.

The hearing request along with a valid check payable to the Commonwealth of Massachusetts in the amount of one hundred dollars ($100.00) must be mailed to:

Commonwealth of Massachusetts
Department of Environmental Protection
P.O. Box 4062
Boston, MA 02211

This request will be dismissed if the filing fee is not paid, unless the appellant is exempt or granted a waiver as described below. The filing fee is not required if the appellant is a city or town (or municipal agency), county, or district of the Commonwealth of Massachusetts, or a municipal housing authority.

MassDEP may waive the adjudicatory hearing-filing fee for a person who shows that paying the fee will create an undue financial hardship. A person seeking a waiver must file, together with the hearing request as provided above, an affidavit setting forth the facts believed to support the claim of undue financial hardship.

Enclosed is a stamped approved copy of the application submittal.

Should you have any questions concerning this Plan Approval, please contact Samrawit Dererie by telephone at 508-946-2755, or in writing at the letterhead address.

Thomas Cushing
Permit Chief
Bureau of Waste Prevention

Enclosure
Ecc: Health Department, Fall River, MA
Fire Department, Fall River, MA
Eric Pearson, ESS Group, Inc.

Maria Pinaud, MassDEP/SERO/BWP
Yi Tian, MassDEP/Boston

APPENDIX A
SWIMEX
EMISSION FACTORS AND EMISSION LIMITATIONS

Operation	Process Materials	Maximum Pollutant Content (weight %)				Emission Factor
		Styrene[4] (single HAP)	Total HAPs	Maximum VOC	Non-monomer VOC	
Gelcoat Application (EU 1)	White ISO Fire Retardant	36	36	36	< 5%	Note 1
	Mystic Blue	34	39	39	< 5%	Note 1
	Medium Blue	35	43	43	< 5%	Note 1
	BR Green	35	44	44	< 5%	Note 1
	Red	34	42	42	< 5%	Note 1
	Yellow	30	38	38	< 5%	Note 1
	Patchaid	48	96	96	N/A	Note 1
	Ferro White	33	38	38	< 5%	Note 1
	Clear gelcoat	37	43	43	< 5%	Note 1
Closed Molding (EU 2)	Resin	33	33	33	N/A	0.04%[2]
Open molding Operations (EU 3)	GP resin, low styrene	33	33	33	< 5%	Note 1
	VE resin Ashland 6001 T-25	32	32	32	< 5%	Note 1
	Putty (CCP PPIVEOP)	30	30	30	< 5%	Note 1
	Putty (Durant F9000W)	19	19	19	< 5%	Note 1
Catalysts		0	0	100	N/A	100%
Acetone Cleanup (EU 4)		0	0	0	N/A	100%
Adhesive/Sealant Application operations (EU 5)				**Total VOC Content limit as applied[3] (grams/Liter)**		
Adhesives				≤ 200		
Sealants				≤ 420		

Notes

1. Refer to Emission Factors contained in Appendix B of this Approval
2. Emission factor for the closed molding (SCRIMP™) process is based on results of testing conducted by TPI Industries and takes into account the 90% overall efficiency of the carbon filter as contained in Table 1 of this Plan Approval. Emission factor represents percent of resin usage.
3. VOC usage as contained in adhesive/ Sealant material shall not exceed the "As applied" VOC content limit detailed in 310 CMR 7.18(30) Table 1, Table 2.
4. Styrene is the maximum single HAP

APPENDIX B

SWIMEX

Emission Factors to Calculate Organic HAP Emissions for Open Molding Process Streams

Type of Operation	And you use…	With…	Use this organic HAP Emission Factor (EF) equation for materials with <33% organic HAP (19% HAP for no atomized gelcoat)[123]	Use this organic HAP Emission Factor (EF) equation for materials with ≥ 33% organic HAP (19% HAP for no atomized gelcoat) [123]
Open Molding Operation	a. Manual resin application	i. Non-vapor suppressed resin	EF=0.126 x %HAP x 2000	EF= ((0.286 x %HAP)-0.0529) x 2000
		ii. Vapor-suppressed resin	EF=0.126 x %HAP x 2000 x (1-(0.5 x VSE factor))	EF= ((0.286 x %HAP)-0.0529) x 2000 x ((1-(0.5 x VSE factor))
	b. Atomized Mechanical resin application	i. Non-vapor suppressed resin	EF=0.169 x %HAP x 2000	EF=((0.714 x %HAP)-0.18) x 2000
		ii. Vapor-suppressed resin	EF=0.169 x %HAP x 2000 x (1-(0.45 x VSE factor)	EF=0.126 x %HAP x 2000
	c. Non-atomized mechanical resin application	i. Non-vapor suppressed resin	EF=0.107 x %HAP x 2000	EF=((0.157 x %HAP)-0.0165) x 2000
		ii. Vapor-suppressed resin	EF=0.107 x %HAP x 2000 x (1-(0.45 x VSE factor)	EF=((0.157 x %HAP)-0.0165) x 2000 x (1-(0.45 x VSE factor))
	d. Atomized mechanical resin application with robotic or automated spray control[4]	Non-vapor-suppressed resin	EF=0.169 x %HAP x 2000 x 0.77	EF=0.77 x ((0.714 x %HAP)-0.18) x 2000
	e. Atomized spray gelcoat application	Non-vapor suppressed gelcoat	EF=0.445 x %HAP x 2000	EF=((1.03646 x %HAP)-0.195) x 2000
	f. Non- atomized spray gel coat application	Non-vapor suppressed gelcoat	EF=0.185 x %HAP x 2000	EF=((0.4506 x %HAP)-0.0505) x 2000
	g. Atomized spray gelcoat application using robotic or automated spray	Non-vapor suppressed gelcoat	EF=0.445 x %HAP x 2000 x 0.73	EF=(1.03646 x %HAP)-0.195 x 2000 x 0.73

Source: 40 CFR 63 Subpart WWWW, Table 1 (August 25, 2005)

Notes

1. To obtain the organic HAP emission factor value for an operation with an add-on control device multiply the EF above by the add-on control factor calculated using Equation 1 of § 63.5810. The organic HAP emission factors have units of lbs of organic HAP per ton of resin or gelcoat applied
2. Percent HAP means total weight percent of organic HAP (styrene, methyl Methacrylate, and any other organic HAP) in the resin or gel coat prior to the addition of fillers, catalysts, and promoters. Input the percent HAP as decimal, i.e., 33 percent HAP should be input as 0.33, not 33.
3. The VSE factor means the percent reduction in organic HAP emissions expressed as a decimal measured by the VSE test method of Appendix A to this Subpart
4. This equation is based on an organic HAP emissions factor equation developed for mechanical atomized controlled spray. It may only be used for automated or robotic spray systems with atomized spray. All spray operations using hand held guns must use the appropriate mechanical atomized or mechanical non-atomized organic HAP emissions factor equation. Automated or robotic spray systems using non-atomized spray should use the appropriate non-atomized mechanical resin application equation.